

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

FILED IN OPEN COURT
ON 4-25-2023 BG
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

NO. 7:23-CR-42-D-RJ

UNITED STATES OF AMERICA)
)
)
)
)
TYRESE JERRY DAWSON)

v.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about March 19, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess with the intent to distribute a quantity of Fentanyl, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

On or about March 19, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly possess a firearm, that is, a machinegun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924 (c)(1)(B)(ii).

COUNT THREE

On or about March 19, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess a machine gun, to wit: a machinegun conversion device commonly referred to as a

“Glock Switch,” in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FOUR

On or about June 25, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess with the intent to distribute a quantity of Marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about June 25, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly possess a firearm, that is, a machinegun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as alleged in Count Four of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924 (c)(1)(B)(ii).

COUNT SIX

On or about June 25, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess a machine gun, to wit: a machinegun conversion device commonly referred to as a “Glock Switch,” in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT SEVEN

On or about July 13, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess with the intent to distribute a quantity of Fentanyl, a Schedule II Controlled Substance,

in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about July 13, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly possess a, firearm, that is, a machinegun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as alleged in Count Seven of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924 (c)(1)(B)(ii).

COUNT NINE

On or about July 13, 2022, in the Eastern District of North Carolina, the defendant, TYRESE JERRY DAWSON, did knowingly and intentionally possess a machine gun, to wit: a machinegun conversion device commonly referred to as a “Glock Switch,” in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

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FORFEITURE NOTICE

The defendant is given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to:

- (1) \$7500 in United States Currency seized on July 13, 2022;
- (2) A Glock-type, Privately Made Firearm, 9 x 19mm caliber, with no serial number and machine gun conversion device seized on March 19, 2022, and all associated magazines and ammunition;

(3) A Glock-type, Privately Made Firearm, 9 x 19mm caliber, with no serial number and machine gun conversion device seized on June 27, 2022, and all associated magazines and ammunition;

(4) A Glock-type, Privately Made Firearm, 9 x 19mm caliber, with no serial number and machine gun conversion device seized on July 13, 2022, and all associated magazines and ammunition;

If any of the above-described forfeitable property, as a result of any act or omission of a defendant:

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- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

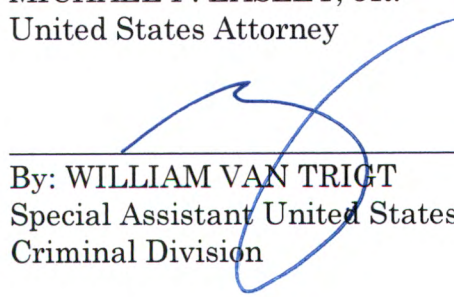
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

4/25/2023
DATE:

MICHAEL F. EASLEY, JR.
United States Attorney


By: WILLIAM VAN TRIGT
Special Assistant United States Attorney
Criminal Division